III. Remarks

The Action rejects claims 1-7, 12-21 and 23-28 as being obvious from U.S. Patent No. 6,069,782 to Lien et al. in view of U.S. Patent No. 6,775,112 to Smith et al.

Independent claim 1 has been amended to include the features of now canceled claims 5 and 6, namely that the "device coupled to the voltage drop circuit" comprises "a N-type MOS (NMOS) transistor." Claim 7 has been amended to correct its dependency. It is submitted that the "device" of Lien et al. is not an NMOS transistor as claimed.

In rejecting claims 5-6 the Examiner identified the "device" as transistor 121 of FIG. 2B. and refers Applicants to the disclosure of Lien et al. at Col. 7, Lines 5-6. It is submitted that although this portion of Lien et al. states that "[t]ransistor 121 is an n-MOS transistor", this is clearly not the case when looking at FIG. 2B. The transistor symbol used for transistor 121 and its electrical connections are clearly those of a **PMOS** transistor.

For at least these reasons, it is submitted that independent claim 1 and its dependent claims are allowable over the cited combination.

Claim 7 recites further that the "gate terminal and a drain terminals of the NMOS transistor are common" and has been amended to recite that these terminal are "coupled to the output terminal of the sensor." Turning to FIG. 2B of Lien et al., the common terminals of the PMOS device 121 are coupled to ground, not the output terminal of the sensor. For these additional reasons, it is submitted that claim 7 is independently allowable over the art of record.

Independent claim 13 has been amended to recite that the ESD protection circuit has a "stack of cascaded NMOS transistors configured to discharge an ESD pulse." The Examiner relies on FIG. 4 of Smith et al. for showing cascaded NMOS transistors M₄₀ to M_N. FIG. 4 does not show and Smith et al. does not teach or suggest providing <u>stacked cascaded NMOS</u> transistors as shown in, for example, FIG. 3 (transistors 325, 326) of the present application. For at least these reasons, it is submitted that claim 13 and its dependent claims are allowable over the cited reference.

Claim 14 has been amended to be consistent with the amendments to claim 13.

Independent claim 23 has been amended in a manner similar to claim 13. Claim 28 has been amended consistent with the amendments to claim 23. It is submitted that claim 23 and its dependent claims are allowable over the cited combination for reasons analogous to those discussed above in connection with claim 13.

Reconsideration and withdrawal of the rejection of claims 1-4, 7, 12-21 and 23-28 in view of the foregoing arguments and amendments are respectfully requested.

IV. Conclusion

Applicants submit that this application is in condition for allowance. Early notification to that effect is respectfully requested.

The Commissioner for Patents is hereby authorized to charge any additional fees or credit any excess payment that may be associated with this communication to deposit account **04-1679**.

Respectfully submitted,

Dated: <u>8.21-2007</u>

Joseph A. Powers, Reg. No.: 47,006

Attorney For Applicants

DUANE MORRIS LLP 30 South 17th Street Philadelphia, Pennsylvania 19103-4196 (215) 979-1842 (Telephone) (215) 979-1020 (Fax)